

ATOCHEM
NORTH AMERICA

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Contains No CBI

ATOCHEM NORTH AMERICA, INC.
900 First Avenue, P.O. Box 1536, King of Prussia, Pennsylvania 19406-0018, (215) 337-6500

October 22, 1992

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

Document Processing Center (TS-790)
Office of Toxic Substances
U.S. Environmental Protection Agency
401 M St., S.W.
Washington, D.C. 20460

Attn: Section 8(e) Coordinator (CAP Agreement)

RE: Report Submitted Pursuant to the TSCA Section 8(e)
Compliance Audit Program

CAP Identification Number: 8ECAP-0026

Dear Sir/Madam:

Pursuant to the Toxic Substances Control Act (TSCA) Section 8(e) Compliance Audit Program and the Agreement for TSCA Section 8(e) Compliance Audit Program (CAP Agreement) executed by Elf Atochem North America Inc. (Atochem) and Environmental Protection Agency (EPA), Atochem is submitting the enclosed final report on studies to establish eye and skin irritation potential in rabbits to the EPA. These studies do not involve effects in humans.

Nothing in this letter or the enclosed studies is considered confidential business information of Atochem.

The enclosed studies provide information on the chemicals butyldimethyltin chloride and methyltributyltin chloride. The exact chemical name of butyldimethyltin chloride is butylchlorodimethylstannane and its CAS number is 15649-31-7. The exact chemical name of methyltributyltin chloride is dibutylchloromethylstannane and its CAS number is 33314-72-6.

The title of the enclosed study report is Eye and Primary Skin Irritation Tests With MTB-67 Butyldimethyltin Chloride and MTB-68 Methyltributyltin Chloride in Albino Rabbits. This report consists of several studies. The following is a summary of the adverse effects observed in these studies.

3/3/95

7

TSCA CAP
Butyldimethyltin Chloride and Methyltributyl Chloride
October 22, 1992
Page Two

One-tenth (0.1) ml of butyldimethyltin chloride was instilled into the right eye of each of three rabbits, while 0.1 ml of methyltributyltin chloride was instilled into the left eye of each animal. All test animals died within 20 to 45 minutes after instillation. One-half (0.5) ml of butyldimethyltin chloride was applied to the right flank of each of three rabbits, while 0.5 ml of methyltributyltin chloride was applied to the left flank of each rabbit. All of the animals died within 60 to 90 minutes after application.

To our knowledge, Atochem has not previously submitted any TSCA Section 8(e) notices or premanufacture notifications on the subject chemicals.

Further questions regarding this submission may be directed to me at 215 337-6892.

Sincerely,



C.H. Farr, PhD, DABT
Manager, Product Safety
and Toxicology

Enclosures

✓ FILED: CN 4791-85

TR91-671

Industrial **BIO-TEST** *Laboratories, Inc.*

1810 FRONTAGE ROAD
NORTHBROOK, ILLINOIS 60062

TOXICOLOGY
ENVIRONMENTAL SCIENCES
CHEMISTRY
PLANT SCIENCES
MEDICAL SCIENCES

AREA CODE 312
TELEPHONE 272-3030

June 13, 1973

Mr. Arthur W. Sheldon
Manager of Product Registration
M & T Chemicals Inc.
General Offices
Rahway, New Jersey 07065

T-471

Dear Mr. Sheldon:

Re: IBT No. 601-03454 - Eye and Primary Skin Irritation
✓ Tests with MTB-67 Butyldimethyltin Chloride and
✓ MTB-68 Methyltributyltin Chloride in Albino Rabbits

We are enclosing three copies of our laboratory report
dated June 13, 1973, prepared in connection with the above study.

Very truly yours,



J. C. Calandra
President

JCC:jv

CAS: 15649-31-7
333/4-72-6

REPORT TO

M & T CHEMICALS, INC.

EYE AND PRIMARY SKIN IRRITATION TESTS WITH
MTB-67 BUTYLDIMETHYLTIN CHLORIDE AND
MTB-68 METHYLDIBUTYLTIN CHLORIDE
IN ALBINO RABBITS

JUNE 13, 1973

IBT NO. 601-03454

I. Eye Irritation Tests - Albino Rabbits

Exactly 0.1 ml of undiluted MTB-67 was instilled into the right eye of each of three rabbits, while 0.1 ml of undiluted MTB-68 was instilled into the left eye of each animal.

All of the rabbits died within 20 to 45 minutes after instillation.

II. Primary Skin Irritation Tests - Albino Rabbits

Exactly 0.5 ml of undiluted MTB-67 was applied to one intact and one abraded test site on the right flank of each of three rabbits. MTB-68 was similarly applied to the left flank of each animal.

All of the animals died within 60 to 90 minutes after application of the test materials.

Respectfully submitted,

INDUSTRIAL BIO-TEST LABORATORIES, INC.

Carmen Mastri
Carmen Mastri, B.S.
Section Head, Acute Toxicity



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

C. H. Farr, PhD, DABT
Manager, Product Safety and Toxicology
Atochem North America, Inc.
900 First Avenue
P.O. Box 1536
King of Prussia, Pennsylvania 19406-0018

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

APR 24 1995

EPA acknowledges the receipt of information submitted by your organization under Section 8(e) of the Toxic Substances Control Act (TSCA). For your reference, copies of the first page(s) of your submission(s) are enclosed and display the TSCA §8(e) Document Control Number (e.g., 8EHQ-00-0000) assigned by EPA to your submission(s). Please cite the assigned 8(e) number when submitting follow-up or supplemental information and refer to the reverse side of this page for "EPA Information Requests".

All TSCA 8(e) submissions are placed in the public files unless confidentiality is claimed according to the procedures outlined in Part X of EPA's TSCA §8(e) policy statement (43 FR 11110, March 16, 1978). Confidential submissions received pursuant to the TSCA §8(e) Compliance Audit Program (CAP) should already contain information supporting confidentiality claims. This information is required and should be submitted if not done so previously. To substantiate claims, submit responses to the questions in the enclosure "Support Information for Confidentiality Claims". This same enclosure is used to support confidentiality claims for non-CAP submissions.

Please address any further correspondence with the Agency related to this TSCA 8(e) submission to:

Document Processing Center (7407)
Attn: TSCA Section 8(e) Coordinator
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
Washington, D.C. 20460-0001

EPA looks forward to continued cooperation with your organization in its ongoing efforts to evaluate and manage potential risks posed by chemicals to health and the environment.

Sincerely,

Terry R. O'Bryan
Terry R. O'Bryan
Risk Analysis Branch

Enclosure

12581A



Recycled/Recyclable
Printed with Soy/Canola Ink on paper that
contains at least 50% recycled fiber

Triage of 8(e) Submissions

Date sent to triage: 12/14/95

NON-CAP

CAP

Submission number: 12581A

TSCA Inventory:

Y

N

D

Study type (circle appropriate):

Group 1 - Dick Clements (1 copy total)

ECO

AQUATO

Group 2 - Ernie Falke (1 copy total)

ATOX

SBTOX

SEN

w/NEUR

Group 3 - Elizabeth Margosches (1 copy each)

STOX

CTOX

EPI

RTOX

GTOX

STOX/ONCO

CTOX/ONCO

IMMUNO

CYTO

NEUR

Other (FATE, EXPO, MET, etc.):

Notes:

THIS IS THE ORIGINAL 8(e) SUBMISSION; PLEASE REFILE AFTER TRIAGE DATABASE ENTRY

For Contractor Use Only			
entire document	<u>0</u>	1 2	pages <u>1,2</u>
Notes:			
Contractor reviewer :	<u>LPS</u>	Date:	<u>4/14/95</u>



CECATS/TRIAGE TRACKING DBASE ENTRY FORM

CECATS DATA:

Submission # BEHQ-1092-12581 SEQ. A

TYPE: INT SUPP FLWP

SUBMITTER NAME: Elf Atochem North America, Inc

INFORMATION REQUESTED: FLWP DATE:

0501 NO INFO REQUESTED
0502 INFO REQUESTED (TECH)
0503 INFO REQUESTED (VOL ACTIONS)
0504 INFO REQUESTED (REPORTING RATIONALE)
DISPOSITION:

0503 REFER TO CHEMICAL SCREENING
0578 CAP NOTICE

VOLUNTARY ACTIONS:

0401 NO ACTION REPORTED
0402 STUDY'S PLANNING (NINE WAY)
0403 NOTIFICATION (NINE WAY)
0404 LARFIAMSDS (TIANG'S)
0405 PROCESSHANDLING (TIANG'S)
0406 APPAUSE DISCONTINUED
0407 PRODUCTION DISCONTINUED
0408 CONFIDENTIAL

SUB. DATE: 10/22/92 OTS DATE: 10/30/92 CSRAD DATE: 03/03/95

CHEMICAL NAME:

Stannane, butylchlorodimethyl-

Stannane, dibutylchlorodimethyl-

CASE

15649-31-7 → MTB-67

33314-72-6 → MTB-68

INFORMATION TYPE:

0201 ONCO (HUMAN)
0202 ONCO (ANIMAL)
0203 CELL TRANS (IN VITRO)
0204 MUTA (IN VITRO)
0205 MUTA (IN VIVO)
0206 REPRO/TERATO (HUMAN)
0207 REPRO/TERATO (ANIMAL)
0208 NEURO (HUMAN)
0209 NEURO (ANIMAL)
0210 ACUTE TOX. (HUMAN)
0211 CHR. TOX. (HUMAN)
0212 ACUTE TOX. (ANIMAL)
0213 SUB ACUTE TOX (ANIMAL)
0214 SUB CHRONIC TOX (ANIMAL)
0215 CHRONIC TOX (ANIMAL)

P.F.C

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01 02 04

INFORMATION TYPE:

0216 EPICLIN
0217 HUMAN EXPOS (PROD CONTAM)
0218 HUMAN EXPOS (ACCIDENTAL)
0219 HUMAN EXPOS (MONITORING)
0220 ECO/AQUA TOX
0221 ENV. OCCUREL/FATE
0222 EMER INCI OF ENV CONTAM
0223 RESPONSE REQUEST DELAY
0224 PRODCOMP/CHEM ID
0225 REPORTING RATIONALE
0226 CONFIDENTIAL
0227 ALLERG (HUMAN)
0228 ALLERG (ANIMAL)
0229 METAB/PHARMACO (ANIMAL)
0230 METAB/PHARMACO (HUMAN)

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INFORMATION TYPE:

0241 IMMUNO (ANIMAL)
0242 IMMUNO (HUMAN)
0243 CHEMPHYS PROP
0244 CLASTO (IN VITRO)
0245 CLASTO (ANIMAL)
0246 CLASTO (HUMAN)
0247 DNA DAMREPAIR
0248 PRODAUSE/PROC
0251 MSDS
0259 OTHER

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TRIAGE DATA:

NON-CBI INVENTORY

YES

CAS SR

NO

IN IT MIMI

ONGOING REVIEW

YES (DROP/REFER)

NO (CONTINUE)

REFER

SPECIES

RBT

TOXICOLOGICAL CONCERN:

LOW

MED

HIGH

Eye irrit RBT; Dermal irrit RBT

USE:

PRODUCTION:

COMMENTS:

12581A

H

toxicity
Eye ~~irritation~~ in rabbits is of high concern. Instillation of 0.1 mL butyldimethyltin chloride into the right eye and 0.1 mL methyldibutyltin chloride into the left eye of three rabbits was lethal to all within 20-45 minutes.

H

toxicity
Dermal ~~irritation~~ in rabbits is of high concern. Application of 0.5 mL butyldimethyltin chloride to the right flank and 0.5 mL methyldibutyltin chloride to the left flank of three rabbits was lethal to all within 60-90 minutes.